

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Transcraft Corporation  
Attn: Mr. Mike Gordy, Vice President Operations  
110 Florsheim Drive  
Anna, Illinois 62906

<u>Application No.:</u> 02070026	<u>I.D. No.:</u> 181005AAA
<u>Applicant's Designation:</u>	<u>Date Received:</u> July 9, 2002
<u>Subject:</u> Truck Trailer Assembly Operations	
<u>Date Issued:</u>	<u>Expiration Date:</u>
<u>Location:</u> 104 Transcraft Drive, Anna, Illinois, 62906	

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of two liquid paint booths, solvent cleanup operations, one wash booth, a plasma cutting operation, and natural gas-fired emission units (7.0 mmBtu/hr combined), pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons per year of volatile organic material (VOM), 10 tons per year of any single hazardous air pollutant (HAP), and 25 tons per year of combined HAPs). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
- 2a. Total combined emissions of VOM from the two liquid paint booths, solvent cleanup operations, and wash booth shall not exceed 9.9 tons/month and 98.85 tons/year. These emissions shall be determined from the following equation on a monthly basis:

$$E = \sum (M_i \times V_i) / 2,000$$

Where:

E = VOM emissions (tons)

M<sub>i</sub> = Usage of each VOM-containing material (coatings, thinners, cleaning solvents, etc., in gallons)

$V_i$  = VOM content of each material (lb/gallon)

These limits are based on maximum material usage and 100% emission of the VOM content of these materials. Compliance with the annual limit shall be determined monthly from the last 12 months of data.

- b. This permit is issued based on negligible emissions of particulate matter (PM) from the two liquid paint booths and plasma cutting operation. For this purpose emissions from each emission source shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/yr.
- c. Emissions and operation of all natural gas-fired emission units (combined) shall not exceed the following limits:

Natural Gas Usage	
(mmscf/Mo)	(mmscf*/Yr)
6	60

\* 1 mmscf = 10,200 therms

<u>Pollutant</u>	<u>Emission Factor</u> (Lb/mmscf)	<u>Emissions</u>	
		(Tons/Mo)	(Tons/Yr)
Nitrogen Oxides (NO <sub>x</sub> )	100	0.30	3.00
Carbon Monoxide (CO)	84	0.26	2.52
Particulate Matter (PM)	7.6	0.03	0.23
Volatile Organic Material (VOM)	5.5	0.02	0.17
	Totals:	0.61	5.92

These limits are based on the combined maximum firing rates (7.0 mmBtu/hr combined), maximum operating time (8,760 hr/yr), and standard AP-42 emission factors. Compliance with annual limits shall be determined from a running total of 12 months of data.

- d. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
3. Testing for VOM content of coatings and other materials shall be performed in accordance with 35 IAC 215.208(a) and as follows:
    - a. Upon reasonable request by the Illinois EPA, the VOM content of specific coatings and cleaning solvents used on each affected coating line shall be determined according to USEPA Reference Method 24 or 24A of 40 CFR 60, Appendix A, and the procedures of 35 IAC 215.105(a).

- b. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records directly reflect the application of such material and separately account for any additions of solvent thinner.
4. The Permittee shall maintain monthly records of the following items:
  - a. Records of results of testing of the VOM content of the coatings and other materials performed pursuant to Condition No. 3.
  - b. Names, usage, VOM content, and HAP content of all VOM-containing materials used, including all coatings, thinners, cleanup solvents, and washer solvents (gal/mo, gal/yr, lb/gal, lb/gal).
  - c. Natural gas usage (mmscf/mo, mmscf/yr).
  - d. VOM, single HAP, and combined HAPS emissions with supporting calculations (ton/mo, ton/yr).
5. The Permittee shall maintain daily records of the usage and VOM content of each liquid coating, as-applied (minus water and any compounds specifically exempted from the definition of VOM), including the applicable VOM content limit (lb/gallon) for each such coating applied, to ensure compliance with 35 Ill. Adm. Code 215.204(j), Miscellaneous Metal Parts and Products Coating, as follows:
  - a. Air dried coatings shall not exceed 3.5 lb/gal, pursuant to 35 Ill. Adm. Code Section 215.204(j) (2).
  - b. Extreme performance coatings shall not exceed 3.5 lb/gal, pursuant to 35 Ill. Adm. Code Section 215.204(j) (3).
  - c. The use and recordkeeping of touch-up and repair coatings shall comply with 35 Ill. Adm. Code Section 215.206(b) and (c), respectively.
6. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
7. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

8. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
2009 Mall Street  
Collinsville, Illinois 62234

If you have any questions on this, please call Jim Kallmeyer at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

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cc: Illinois EPA, FOS Region 3  
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from this truck trailer assembly facility operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels, e.g., 100 tons/year of VOM, 10 tons per year of single HAP, and 25 tons per year of combined HAPs at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled and control measures are more effective than required in this permit.

<u>Emission Units</u>	<u>Emissions (Tons/Year)</u>					
	<u>VOM</u>	<u>PM</u>	<u>NO<sub>x</sub></u>	<u>CO</u>	<u>Single HAP</u>	<u>Combined HAPs</u>
2 Liquid Paint Booths, Cleanup, & Wash Booth	98.85	0.88			< 10	< 25
Plasma Cutting		0.44				
Natural Gas-Fired Units	<u>0.17</u>	<u>0.23</u>	<u>3.00</u>	<u>2.52</u>		
Totals	99.02	1.55	3.00	2.52	< 10	< 25

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## PROJECT SUMMARY

### I. INTRODUCTION

Transcraft Corporation has submitted an application for a Title V Federally Enforceable State Operating Permit (FESOP) which contains limitations on air pollutant emissions for their truck trailer assembly facility located at 104 Transcraft Drive in Anna. These limits prevent the site from being classified as a major source of air emissions, making it unnecessary to obtain a federal permit under the Clean Air Act Permit Program (CAAPP). The FESOP limitations, which are enforceable both by the State of Illinois and the USEPA, are accompanied by recordkeeping and reporting requirements to ensure the site is operated as a non-major source.

### II. SOURCE DESCRIPTION

Transcraft Corporation assembles and paints truck trailer equipment. The facility operates a plasma cutter, a wash booth, two liquid paint booths, a natural gas-fired boiler, and several other natural gas-fired units.

### III. EMISSIONS

Emissions of volatile organic material (VOM) and hazardous air pollutants (HAPs) result primarily from operation of the paint booths and use of clean-up solvents. Small amounts of particulate matter (PM) are emitted from the spray booths and from the plasma cutter. Emissions of nitrogen oxide (NO<sub>x</sub>) and carbon monoxide (CO) occur as products of natural gas combustion.

The FESOP limits the potential annual emissions of VOM, single HAP, and combination of HAPs from this facility to levels below major source thresholds, classifying it as a non-major source.

### IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with Illinois Pollution Control Board emission standards, which represent the basic requirements for all sources in Illinois. This plant complies with the Board standards for all criteria pollutants and HAPs.

### V. PROPOSED PERMIT

The conditions of the FESOP constitute limitations ensuring this plant will be operated as a non-major source. These conditions limit the amount of materials, including coatings, thinners, and clean-up solvents, which may be used. These limitations are consistent with the historical operation and capacity of the plant. The permit conditions also establish appropriate compliance procedures, including recordkeeping and reporting requirements. Transcraft Corporation must carry out these procedures on a continual basis to demonstrate their equipment is operating within the limitations established by the permit.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's determination that this source meets all applicable state and federal air pollution control requirements, subject to the conditions of the proposed permit. The Illinois EPA, therefore, proposes to issue a Title V FESOP having federally enforceable limits for the above referenced equipment.

Comments are requested on the conditions of this permit which is proposed for issue by the Illinois EPA. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 166.

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